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Attorneys for Plaintiffs
THE CITY OF SAN JOSE; THE CITY OF
JOSE, AS SUCCESSOR AGENCY TO THE
REDEVELOPMENT AGENCY OF THE
CITY OF SAN JOSE; and THE SAN JOSE
DIRIDON DEVELOPMENT AUTHORITY

JOINT STIPULATION AND ORDER TO EXTEND ADR DEADLINE

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA / SAN JOSE DIVISION

CITY OF SAN JOSÉ; CITY OF SAN
JOSÉ AS SUCCESSOR AGENCY TO
THE REDEVELOPMENT AGENCY OF
THE CITY OF SAN JOSÉ; and THE SAN
JOSÉ DIRIDON DEVELOPMENT
AUTHORITY,

Plaintiffs,

v.

OFFICE OF THE COMMISSIONER OF
BASEBALL, an unincorporated association
doing business as Major League Baseball;
and ALLAN HUBER "BUD" SELIG,

Defendants.

Case No. 13-CV-02787-RMW

**JOINT STIPULATION AND
ORDER TO EXTEND ADR DEADLINE**

Judge: Hon. Ronald M. Whyte

Date Filed: June 18, 2013

Trial Date: None set

1 Plaintiffs City of San Jose, City of San Jose as successor agency to the Redevelopment
 2 Agency of the City of San Jose, and the San Jose Diridon Development Authority (collectively
 3 “San Jose” or “Plaintiffs”) and Defendants the Office of the Commissioner of Baseball and Allan
 4 H. Selig (collectively “MLB” or “Defendants”) (collectively, the “Parties”), jointly submit this
 5 Joint Stipulation and Proposed Order to Extend ADR Deadline.

6 WHEREAS, on June 18, 2013, the Court assigned this matter to the Alternative Dispute
 7 Resolution (ADR) Multi-Option Program (*see* Dkt. 4);

8 WHEREAS, Local Rules require the Parties to either stipulate to an ADR option or
 9 request a telephone conference with ADR staff (*see* N.D. Cal. Civ. L.R. 16-8(c); N.D. Cal. ADR
 10 L.R. 3-5(c));

11 WHEREAS, the Defendants have filed a Motion to Dismiss all of Plaintiffs’ claims for
 12 failure to state a claim (*see* Dkt. 25);

13 WHEREAS, the Parties do not believe they can settle on an agreed ADR process until the
 14 Court clarifies the scope of this matter by ruling on the Motion to Dismiss.

15 IT IS HEREBY STIPULATED AND AGREED that the deadline to file a Stipulation to
 16 ADR Process or Notice of Need for ADR Telephone Conference is hereby extended until 30 days
 17 after the Court rules on any Motion to Dismiss.

18
 19
 20 Dated: September 12, 2013

KEKER & VAN NEST LLP

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 22 By: /s/ John Keker

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 PAULA L. BLIZZARD
 THOMAS E. GORMAN

23
 24 Attorneys for Defendants
 25 OFFICE OF THE COMMISSIONER OF
 26 BASEBALL,
 27 an unincorporated association doing
 business as Major League
 Baseball; and ALLAN HUBER “BUD”
 28 SELIG

1 Dated: September 12, 2013

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3 By: /s/ Joseph W. Cotchett

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9 CITY OF SAN JOSE; CITY OF SAN
10 JOSE AS SUCCESSOR AGENCY TO
11 THE REDEVELOPMENT AGENCY OF
12 THE CITY OF SAN JOSE; and THE SAN
13 JOSE DIRIDON DEVELOPMENT
14 AUTHORITY

13 IT IS SO ORDERED.

14 DATED: Jth 12H



The Honorable Ronald M. Whyte
Judge of the Northern District of California